



COMMUNICATIONS CORPORATION

**January 18, 2008**

Enforcement Bureau  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: **EB-06-36,**  
Certification of CPNI for Calendar Year 2007

To Whom It May Concern:

This certification and accompanying statement for the calendar year 2007 is sent pursuant to FCC 07-22 released April 1, 2007 and Section 64.2009(e) of the Commission's rules in connection with Customer Proprietary Network Information.

If there are any questions in connection with this filing, please contact this office.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Edward W. Clark, Jr.", is written over a faint, circular embossed seal. The signature is fluid and cursive.

Edward W. Clark, Jr.  
President/Secretary/Treasurer

Enclosure

## **STATEMENT REGARDING OPERATING PROCEDURES**

Afton Communications Corporation ("Carrier") has established operating procedures that ensure compliance with the rules and regulations of the Federal Communications Commission which govern the protection of customer proprietary network information (CPNI), 47 C.F.R. Sections 64.2001-2009.

Carrier has a system in place in which the status of each customer's CPNI approval can be established prior to any use, disclosure or access.

Carrier trains its employees in the authorized use of CPNI. Carrier has established disciplinary procedures for any employee which does not adhere to Carrier's CPNI procedures.

Carrier retains a record of the sales and marketing campaigns of it and its affiliates which use the CPNI of customers and Carrier maintains a record of Carrier's compliance for a least the minimum of one year. Carrier's records include a description of each sales or marketing campaign, the specific CPNI which was used in the campaign, the date and purpose of the campaign, and the products or services that were offered as part of the campaign. Carrier also maintains record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. CPNI notifications are provided to customers as required by the Commission's rules. Carrier maintains records of customer approval and notifications for the minimum period of one year.

Carrier has established a supervisory review process regarding compliance with the Commission's CPNI rules for marketing situations. Sales personnel are required to obtain supervisory approval for any proposed marketing request.

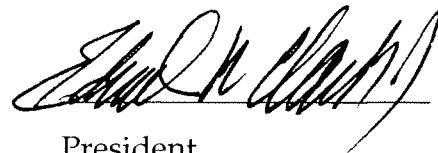
Carrier maintains confidentiality agreements pursuant to the Commission's CPNI rules with any joint venture partner and independent contractor.

### CERTIFICATION

I, Edward W. Clark, Jr. hereby certify this 18<sup>th</sup> day of January, 2008, that I am President of Afton Communications Corporation and that I have personal knowledge that Afton Communications Corporation has established operating procedures that are adequate to assure compliance with the rules codified at 47 C.F.R. Sections 64.2001-2009 which regulate Customer Proprietary Network Information ("CPNI").

There have been no instances in the previous year of actions with data brokers and there have been no customer complaints regarding the unauthorized released of CPNI.

Edward W. Clark, JR.

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President